

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

1) MAURICIO SANCHEZ,

Plaintiff,

v.

- 1) S&H TRANSPORTATION, INC.;
- 2) DENNIS D. WOOD;
- 3) JOHN DOE, a business entity, and
- 4) JANE DOE, an individual,

Defendants.

Case No.

4:20-cv-00374-CVE-FHM

NOTICE OF REMOVAL

COME NOW Defendants S&H Transportation, Inc. ("S&H") and Dennis D. Wood ("Wood"), (together referred to as "Removing Defendants"), under 28 U.S.C. § 1441(a) and (b) and 28 U.S.C. § 1332, file this Notice of Removal.

1. Plaintiff Mauricio Sanchez ("Plaintiff") filed his Petition on July 6, 2020 against S&H Transportation, Inc., Dennis D. Wood, John Doe, and Jane Doe in the district court for Tulsa County, Oklahoma. The case number is CJ-2020-2092.

2. Plaintiff's petition alleges that he suffered personal injuries resulting from an January 6, 2019, automobile accident in Tulsa County. Plaintiff's petition seeks compensatory damages in excess of \$75,000.

3. Plaintiff is a citizen of Oklahoma.

4. Removing Defendant S&H Transportation, Inc. is a citizen of Missouri pursuant to 28 U.S.C. § 1332(C)(1); S&H was incorporated in Missouri and had its principal place of business in Missouri.

5. S&H received the Plaintiff's Petition on July 17, 2020, and filed its special reservation of time on July 28, 2020.

6. Removing Defendant Dennis D. Wood is a citizen of Kansas and is domiciled there.

7. Wood received the Plaintiff's Petition on July 15, 2020, and filed its special reservation of time on July 17, 2020.

8. Defendants John Doe and Jane Doe are unknown entities who cannot be served, consulted, or noticed for this removal.

9. This Court has subject matter jurisdiction under 28 U.S.C. § 1332(a)(1) as there is complete diversity of citizenship.

10. The following is a complete list of the process, pleadings, motions, and orders served on the Removing Defendants:

- a. Exhibit 1 – Petition
- b. Exhibit 2 – Special Entry of Appearance and Reservation of Time for
S&H Transportation, Inc.
- c. Exhibit 3 – Special Entry of Appearance and Reservation of Time for
Dennis D. Wood.
- d. Exhibit 4 – Copy of State Court Docket Sheet

11. Contemporaneous with the filing of this Notice, Removing Defendants will mail a copy of this Notice of Removal together with a Notice of Removal to Federal Court (attached as Exhibit 7) for filing in the District Court of Tulsa County, Oklahoma. Removing Defendants will also provide a copy of this Notice to Plaintiff.

12. Plaintiff demanded a jury trial in his Petition. Removing Defendants also demand jury trial on any applicable issues.

Respectfully submitted,

By /s/ Rebecca L. Newman
DAN S. FOLLUO, OBA NO. 11303
dfolluo@rhodesokla.com
REBECCA L. NEWMAN, OBA NO. 30898
rlnewman@rhodesokla.com
RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, P.L.L.C.
P.O. Box 21100
Tulsa, Oklahoma 74121
(918) 582-1173
(918) 592-3390 (facsimile)
ATTORNEYS FOR DEFENDANT
S&H TRANSPORTATION, INC. and
DENNIS D. WOOD

CERTIFICATE OF SERVICE

I certify that on the 30th day of July 2020, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

John Paul Truskett
Samuel T. Perrine

/s/ Rebecca L. Newman
REBECCA L. NEWMAN